UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

DEVANDER SINGH,

19 CV 1984

Plaintiff,

**Letter Requesting Conference** 

-against-

-----X

M. J. RML J. JBW

RONALD POLES, PENSKE TRUCK LEASING CO., L.P., PENSKE TRUCK LEASING CORPORATION, COSTCO WHOLESALE CORPORATION, COSTCO WHOLESALE MEMBERSHIP, INC. and SAHIB S. WALIA,

Defendants.

--X

### Filed by ECF only

Magistrate Judge Robert M. Levy United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Dear Judge Levy:

I am the attorney for the plaintiff in the above captioned case and write to request a conference, either by phone or in person.

The fact discovery deadline in this case is scheduled for November 20, 2019. We have, by repeated phone calls and certified letters over the course of several months, attempted to arrange the deposition and defense medical exam of my client. I have not heard from defense counsel as to scheduling and fear being unable to meet the Court imposed deadline. I have annexed copies of my certified letters with this correspondence. Thank you for your kind consideration herein.

Dated: Queens, N.Y.

October 7, 2019

Respectfully submitted,

STEPHEN A. SKOR, ESQ. (1027) Attorney for Plaintiff DEVANDER SINGH 114-08 101 Avenue, Second Floor Richmond Hill, N.Y. 11419 (718) 850-6992

To: Bradley K. Bettridge, Esq. c/o
SIMMONS JANNACE DELUCA, LLP.
Attorneys for Defendants
RONALD POLES and COSTCO WHOLESALE CORPORATION
43 Corporate Drive
Hauppauge, New York 11788-2048
(631) 873-4888

STEPHEN A. SKOR, ESQ. ATTORNEY AT LAW 114-08 101<sup>st</sup> AVENUE, 2<sup>ND</sup> FLOOR RICHMOND HILL, N.Y. 11419

TEL: (718) 850-6992 & TEL: (914) 434-6092

FAX: (718) 850-6999

August 23, 2019

VIA CERTIFIED MAIL

7019 0160 0000 2301 9414

Bradley K. Bettridge, Esq. c/o

SIMMONS JANNACE DELUCA, LLP.

43 Corporate Drive

Hauppauge, New York 11788-2048

Re:

Devander Singh v. Donald Poles, et al.

D/Accident:

June 7, 2018

Dear Mr. Bettridge:

As you are aware, I am the attorney for the plaintiff Devander Singh. Pursuant to the proceedings held before Magistrate Judge Robert M. Levy on May 22, 2019, the fact discovery deadline in this case is 11/20/19.

My office has provided all requested discovery and there is no discovery outstanding from the Plaintiff. Plaintiff is available for a deposition and defense medical examinations. Please call my EBT clerk ANGIE to set up depositions. I suggest the following dates:

September: 10, 12, 16

October: 9, 15, 16, 21, 28, 31

November: 4, 5, 6, 8, 11, 12, 14, 15

Very truly yours,

STEPHEN A. SKOR, ESQ. (1027)

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STEPHEN A. SKOR, ESQ. ATTORNEY AT LAW 114-08 101<sup>st</sup> AVENUE, 2<sup>ND</sup> FLOOR RICHMOND HILL, N.Y. 11419

TEL: (718) 850-6992 & TEL: (914) 434-6092

FAX: (718) 850-6999

August 30, 2019

# VIA CERTIFIED MAIL

Bradley K. Bettridge, Esq. c/o SIMMONS JANNACE DELUCA, LLP. 43 Corporate Drive 7019 0160 0000 2301 5027

43 Corporate Drive Hauppauge, New York 11788-2048

Re:

Devander Singh v. Donald Poles, et al.

D/Accident:

June 7, 2018

# Dear Mr. Bettridge:

As you are aware, I am the attorney for the plaintiff Devander Singh. Pursuant to the proceedings held before Magistrate Judge Robert M. Levy on May 22, 2019, the fact discovery deadline in this case is 11/20/19.

Attached please find authorizations for your office to obtain all records/reports/bills from:

1. Dr. Yehuda Kleinman; and,

2. N.Y. Surgery Center of Queens.

# SECOND REQUEST – WE HAVE NOT RECEIVED ANY RESPONSE FROM YOUR OFFICE

My office has provided all requested discovery and there is no discovery outstanding from the Plaintiff. Plaintiff is available for a deposition and defense medical examinations. Please call my EBT clerk ANGIE to set up depositions. I suggest the

following dates:

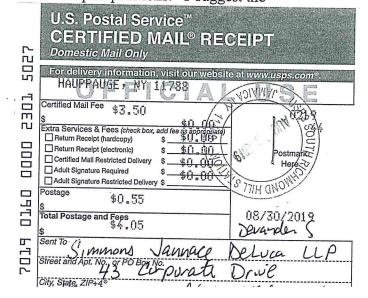
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Very truly yours,

STÉPHEN A. SKOR, ESQ. (1027)



STEPHEN A. SKOR, ESQ. ATTORNEY AT LAW 114-08 101st AVENUE, 2ND FLOOR RICHMOND HILL, N.Y. 11419

TEL: (718) 850-6992 & TEL: (914) 434-6092

FAX: (718) 850-6999

September 30, 2019

7019 0160 0000 2301 5379

#### VIA CERTIFIED MAIL

Bradley K. Bettridge, Esq. c/o SIMMONS JANNACE DELUCA, LLP. 43 Corporate Drive Hauppauge, New York 11788-2048

Re:

Devander Singh v. Donald Poles, et al.

D/Accident:

June 7, 2018

# Dear Mr. Bettridge:

As you are aware, I am the attorney for the plaintiff Devander Singh. Pursuant to the proceedings held before Magistrate Judge Robert M. Levy on May 22, 2019, the fact discovery deadline in this case is 11/20/19.

Attached please find a USB flash drive containing the non-privileged portions of Mr. Singh's prior file.

# THIRD REQUEST - WE HAVE NOT RECEIVED ANY RESPONSE FROM YOUR OFFICE

My office has provided all requested discovery and there is no discovery outstanding from the Plaintiff. Plaintiff is available for a deposition and defense medical examinations. Please call my EBT clerk ANGIE to set up depositions. I suggest the following dates:

October: 9, 15, 16, 21, 28, 31

November: 4, 5, 6, 8, 11, 12, 14, 15

Very truly yours,

STEPHEN A. SKOR, ESQ. (1027)

